

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al.,<sup>1</sup>

Debtors.

x Chapter 11  
: Case No. 24-12534 (JKS)  
:  
: (Jointly Administered)  
:  
:  
v

**EMERGENCY NOTICE OF STATUS CONFERENCE  
MARCH 5, 2025 AT 5:00 P.M. (ET)<sup>2</sup>**

This proceeding will be conducted remotely via **Zoom**.

Please refer to Judge Stickles' Chambers Procedures

(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

**The Zoom link from today's 10 am status conference may be used for this conference.**

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following web address: <https://dm.epiq11.com/CarePoint>

**I. CONTESTED MATTERS**

1. Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/24/2025; D.I. [551](#)].

Related Documents:

- A. Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/24/2025; D.I. [555](#)].
- B. Notice of Plan Supplement to the Combined Disclosure Statement and Joint Chapter 11 Plan Proposed by the Debtors and the Official Committee of Unsecured Creditors [Filed: 02/20/2025; D.I. [730](#)].
- C. Amended Exhibit F to Notice of Plan Supplement [Filed: 02/27/2025; D.I. [768](#)].

Objection Deadline: February 28, 2025 at 4:00 p.m. (ET). An extension to March 3, 2025 has been granted for Maple Healthcare, Strategic Ventures, MedOne/Mazuma Captive and the U.S. Trustee. An extension to March 4, 2025 has been granted for IDB Bank, Dr. Vijayant Singh, Gloria and Cherese Johnson, and the County of Hudson. An extension to March 5, 2025 has been granted for United Healthcare, Committee of Interns and Residents/SEIU, Aetna and Journal Square Urban Renewal Associates. An extension to March 6, 2025 has been granted for the NJ Dept. of Health, and the City of Hoboken. Capitala has been granted an extension through the start of the confirmation hearing.

Objections/Responses Received<sup>3</sup>:

- D. Reservation of Rights of 750 Park LLC, CH Castle LLC, J.C. Opco, LLC and SB Hoboken Propco, LLC with Respect to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/27/2025; D.I. [769](#)].
- E. Objection and Reservation of Rights of Creditor, Resolute Perioperative Services, LLC to the Approval of the Debtors and the Official Committee of Unsecured Creditors' Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [776](#)].

---

<sup>3</sup> The status conference is not a hearing on the merits and accordingly the exhibits attached to the objections have been omitted from the binder submitted to the Court.

- F. Limited Objection and Reservation of Rights of Health Professionals and Allied Employees to the Confirmation of the Combined Plan and Disclosure Statement [Filed: 02/28/2025; D.I. [777](#)].
- G. Limited Objection and Reservation of Rights of District 1199J NUHCE FSCME AFL-CIO to the Confirmation of the Combined Plan and Disclosure [Filed: 02/28/2025; D.I. [778](#)].
- H. Limited Objection of Sodexo Operations, LLC to (I) Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (II) Proposed Cure Amount Set Forth in the notice of Filing of Plan Supplement to the Combined Disclosure Statement and Joint Chapter 11 Plan Proposed by the Debtors and the Official Committee of Unsecured Creditors [Filed: 02/28/2025; D.I. [779](#)].
- I. Objection of 750 Park LLC, CH Castle LLC, J.C. Opco, LLC and SB Hoboken Propco, LLC to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [780](#)].
- J. Objection of Access Information Management Corporation to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [782](#)].
- K. Limited Objection of Med One Capital Funding, LLC and Mazuma Capital Corp to (A) The Debtors' Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization, etc. [Filed: 02/28/2025; D.I. [784](#)].
- L. Limited Objection and Reservation of Rights of VRC Companies, LLC to Confirmation of the Debtors' Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and Objection to Potential Cure Claim, Assumption and Rejection of Executory Contract for the Storage of Medical and Other Records [Filed: 02/28/2025; D.I. [785](#)].
- M. Limited Objection of Horizon Health Care Services, Inc. and Affiliates to Schedule of Assumed Executory Contracts and Unexpired Leases Filed in Connection with Debtors' Combined Plan and Disclosure Statement [Filed: 02/28/2025; D.I. [787](#)].
- N. Response and Limited Objection of JNESO, District Council 1 IUOE AFL-CIO, to Plan Proponents' Fourth Amended Joint Plan of Reorganization [Filed: 02/28/2025; D.I. [788](#)].
- O. Objection of the United States Trustee to Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Plan of Reorganization [Filed: 03/03/2025; D.I. [795](#)].

- P. Limited Objection of Saint Peter's University Hospital to Plan Proponents' Proposed Assumption of Exclusive Services Agreement for Neonatal Services [Filed: 03/03/2025; D.I. [804](#)].
- Q. [SEALED] Objection of Strategic Ventures LLC to Final Approval and Confirmation of Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/03/2025; D.I. 806].
- R. Cure Objection [of UnitedHealthcare Insurance Company] to Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [818](#)].
- S. Objection [of Maple Healthcare, LLC] to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [819](#)].
- T. Committee of Interns and Residents, SEIU's Reservation of Rights to Debtors' Fourth Amended Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [821](#)].
- U. [SEALED] Objection of CarePoint Health Captive Assurance Company, LLC to Final Approval and Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. 822].
- V. Objection of the Lawler Entities to the Plan Proponents' Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [823](#)].
- W. Joinder and Objection to Final Approval of the Disclosure Statement and Confirmation of the Plan [Freehold Trust; Benego Ventures, LLC; Briar Hill Ventures, LLC; Pheasant Run Ventures, LLC; and Vivek Garipalli, collectively the "Objectors"] [Filed: 03/04/2025; D.I. [824](#)].
- X. [SEALED] Omnibus Motion in Limine of Carepoint Health Captive Assurance Company, LLC to Exclude Certain Evidence and Testimony at the Confirmation Hearing [Filed: 03/04/2025; D.I. 827].
- Y. Objection [of Union Kennedy Associates L.P.] to Debtors' Amended Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/05/2025; D.I. [835](#)].
- Z. Reservation of Rights of County of Hudson With Respect to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/05/2025; D.I. [836](#)].

AA. Amended Objection [of Union Kennedy Associates L.P.] to Debtors' Amended Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/05/2025; D.I. [837](#)].

Status: The Court will hold a conference via Zoom at 5 pm regarding witness issues raised by Carepoint Health Captive Assurance. The Zoom link from today's 10 am status conference may be used for this conference.

Dated: March 5, 2025

**DILWORTH PAXSON LLP**

/s/ Peter C. Hughes

---

Peter C. Hughes (DE 4180)  
800 N. King Street, Suite 202  
Wilmington, DE 19801  
Telephone: 302-571-9800  
Facsimile: 302-571-8875  
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)  
Peter C. Hughes (DE 4180)  
Anne M. Aaronson (admitted *pro hac vice*)  
Jack Small (admitted *pro hac vice*)  
1650 Market St., Suite 1200  
Philadelphia, PA 19103  
Telephone: (215) 575-7000  
Facsimile: (215) 754-4603  
Email: lmcmichael@dilworthlaw.com  
Email: phughes@dilworthlaw.com  
Email: aaaronson@dilworthlaw.com  
Email: jsmall@dilworthlaw.com

*Counsel for the Debtors*